

# DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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OFFICE OF THE SECRETARY

Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

## UNITED STATES POSTAL SERVICE FOLLOW-UP INTERROGATORY TO PARCEL SHIPPERS ASSOCIATION WITNESS JELLISON (USPS/PSA-T1-47)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to Parcel Shippers Association witness Jellison: USPS/PSA-T1-47.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Scott L. Reiter

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February 13, 1998

**USPS/PSA-T1-47.** Please refer to your response to USPS/PSA-T1-32. You state that for 1996: "The revenues per piece for flats and parcels that I have used in my testimony are the actual revenues the Postal Service data shows were received for flats and parcels." Table 3 in Exhibit K of witness Crum's testimony (USPS-T-28), as well as Exhibit A in your testimony, shows the Postal Service's estimate of the actual costs for flats and parcels in 1996. While these sets of actual 1996 costs and revenues are clearly comparable, you choose to compare the actual revenues to another set of costs on page 27 of your testimony. Please explain fully why you did not make the simple comparison described above and also explain fully why you believe it would have been inappropriate to do so.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in cursive script, appearing to read "Scott L. Reiter", is written above a horizontal line.

Scott L. Reiter

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